

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ALLY LANDAU, HJSB, HJSC, and
JEWS AT HAVERFORD

Plaintiffs,

v.

THE CORPORATION OF
HAVERFORD COLLEGE

Defendant.

:
: CIVIL ACTION NO.
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: No. 2:24-cv-02044-GAM
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CONSENT MOTION TO SEAL DOCUMENT BY HAVERFORD COLLEGE

Defendant The Corporation of Haverford College (“Haverford” or the “College”) hereby moves for an order to seal “Exhibit 2” to Haverford’s Motion to Dismiss Plaintiffs’ Second Amended Complaint (ECF 37) for the reasons set forth in the accompanying Memorandum of Law. Counsel for Plaintiffs has consented to the relief sought in this Motion. Accordingly, Haverford respectfully requests that this Court grant its Motion and seal “Exhibit 2” to Haverford’s Motion to Dismiss Plaintiffs’ Second Amended Complaint.

Respectfully submitted,

SAUL EWING LLP

Date: February 11, 2025

s/ Joshua W. B. Richards
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MEMORANDUM OF LAW IN SUPPORT OF
CONSENT MOTION TO SEAL DOCUMENT BY HAVERFORD COLLEGE

Plaintiffs have sued Defendant the Corporation of Haverford College (“Haverford” or the “College”) in this Court, asserting claims under Title VI and for breach of contract. (*See* ECF 35). Haverford intends to attach as “Exhibit 2” to its Motion to Dismiss Plaintiffs’ Second Amended Complaint (ECF 37) Haverford’s investigative report concerning Professor Barak Mendelsohn, who is alleged to be a member of the plaintiff association, “Jews at Haverford.”

The investigative report contains sensitive, confidential information concerning non-party Haverford students. Even with the students’ names redacted, publicly filing “Exhibit 2” risks identifying those students and disclosing such confidential information. This Court has previously recognized the privacy concerns of non-party students in relation to this litigation. (*See* ECF 29). Out of respect for such privacy concerns, and pursuant to Haverford’s obligations and its students’ rights under the Family Educational Rights and Privacy Act, 20 U.S.C. § 1232g, and 34 CFR Part 99 (“FERPA”), Haverford respectfully asks this Court to seal the investigative report attached as “Exhibit 2” to its Motion to Dismiss Plaintiffs’ Second Amended Complaint.

Respectfully submitted,

SAUL EWING LLP

Date: February 11, 2025

s/ Joshua W. B. Richards

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CERTIFICATE OF SERVICE

I, Joshua W. B. Richards, certify that on this date I filed via the ECF system a true and correct copy of the foregoing **CONSENT MOTION TO SEAL DOCUMENT BY HAVERFORD COLLEGE AND ACCOMPANYING MEMORANDUM OF LAW**, which constitutes valid service on the following registered users:

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Attorney for Plaintiffs Ally Landau, HJSB, HJSC, and “Jews at Haverford”

Date: February 11, 2025

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Attorney for The Corporation of Haverford College

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[PROPOSED] ORDER

AND NOW, this ____ day of _____ 2025, upon consideration of the Consent Motion to Seal Document by Haverford College (the “Motion”) filed by Haverford College on February 11, 2025, and any response in opposition thereto, it is hereby **ORDERED** that the Motion is **GRANTED**. The Clerk is **ORDERED** to **SEAL** “Exhibit 2” to Haverford College’s Motion to Dismiss Plaintiffs’ Second Amended Complaint.

BY THE COURT:

UNITED STATES DISTRICT JUDGE